**Protection of Lawyers: input**

**regarding Brazil and India**

**Authors [[1]](#footnote-1)\* [[2]](#footnote-2)⊥**

**Henrique Napoleão Alves**. Principal Investigator, Facts and Norms Institute. Ph.D. in Law, Federal University of Minas Gerais. Research Fellow, United Nations Research Institute for Social Development. Former Visiting Researcher, University of Texas at Austin; Former Postdoctoral Fellow, University of Coimbra.

**Adriano Koslides Mitre**. Senior Research Fellow, Facts and Norms Institute. Ph.D. candidate in International Law, University of Paris I. Master of Laws, University of Paris XIII. LL.B., Milton Campos School of Law.

**Samyuktha Banusekar**. Research Fellow, Facts and Norms Institute. B.Com. LL.B. (Hons.) (ongoing), School of Law, SASTRA Deemed University.

**Amit Anand**. Research Fellow, Facts and Norms Institute. Ph.D. candidate, University of Lancaster. LL.M (Human Rights), University of Reading. LL.B (Honours), National Law School of India University, Bengaluru.

**Introduction**

The United Nations Special Rapporteur on the Independence of Judges and Lawyers issued a [call for input](https://www.ohchr.org/EN/Issues/Judiciary/Pages/cfi-protection-lawyers.aspx) with the purpose of informing the Special Rapporteur’s forthcoming report to the Human Rights Council on June 2022.

The Special Rapporteur prepared a [questionnaire](https://www.ohchr.org/Documents/Issues/IJudiciary/Protection/QuestionaireProtectionLlawyers_EN.docx) in order to elicit information from civil society organisations on relevant national experiences on this subject. A similar questionnaire has been sent to all Permanent Missions and Observer Missions to the United Nations Office at Geneva.

The research efforts of Facts and Norms Institute resulted in the following answers to the questionnaire, with relevant information regarding Brazil and India.

***1. Taking into consideration the guarantees for the functioning of lawyers, contained in principles 16-22 of the*** [***Basic Principles on the Role of Lawyers***](https://www.ohchr.org/EN/ProfessionalInterest/Pages/RoleOfLawyers.aspx)***, please describe the constitutional, legal, administrative and policy measures adopted in your country to enable lawyers to exercise their professional activities in favour of their clients in a free and independent manner.***

In Brazil, the content and spirit of the Basic Principles on the Role of Lawyers in general, and principles 16-22 in particular, can be found in the normative framework. According to article 133 of the Brazilian Constitution, lawyers are pivotal actors for the administration of justice, as well as inviolable for their acts and manifestations in the legal exercise of the profession[[3]](#footnote-3). Additionally, Federal Law No. 8906, of 4 July 1994, established the Statute governing the practice of law and the Brazilian Bar Association (“Ordem dos Advogados do Brasil”, or “OAB”), including the fundamentals of the profession of lawyer in the country and the grounds for specific guarantees for the functioning of lawyers (see especially articles 6 and 7).[[4]](#footnote-4) The profession is further regulated, *v.g.*, by the General Ordinance of the Statute of the Practice of Law and the Brazilian Bar Association[[5]](#footnote-5) and by the Bar’s Code of Ethics and Discipline.[[6]](#footnote-6)

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In India, on 2 July 2021, the Bar Council of India released the Draft of the Advocates Protection Bill 2021[[7]](#footnote-7), but this is not in place yet. The purpose of the Bill, according to the preamble, is to safeguard advocates and their roles in the fulfilment of professional obligations. The Bill's aims and arguments are then stated in detail in nine points. The bill's major motivations are claimed to be the protection of advocates and the removal of impediments to their performance of their duties. The bill mentions a number of factors that inhibit the discharge of tasks. A key factor is the recent spike in assaults, kidnappings, intimidation, and continuous threats against activists. When the security of attorneys is jeopardized as a result of their work, the government must provide necessary protection. Such a measure is required to safeguard activists. It further provides that advocates must be provided with social security and the bare necessities of life.

While the Constitution does not provide for specific protective provisions for lawyers, Article 19 of the Constitution would be a viable tool for lawyers to ensure non-interference with their profession. Article 19 was deemed by the Constitution's architects to be one of the country's most important rights. Lawyers have the same rights to freedom of expression, speech, belief, association, and assembly as any other citizen. It implies people have the freedom to express themselves in public and on issues relating to the law, the administration of justice, and the protection of human rights, as well as to attend meetings and create associations in any form of local, national, or international organizations. Lawyers must follow the law and adhere to the recognized norms and ethics of the legal profession in order to exercise these rights.

Furthermore, the legislation *Advocates Act, 1961* was established by the Indian Parliament to create a legislative foundation for legal practitioners as well as recommendations for the creation of the Bar Council and an All-Indian Bar Association. This Act combines all of the legislation of the legal system into a single text.

Article 39A of the Indian Constitution states that each state is responsible for ensuring the proper execution of the legal system by advancing justice based on equal opportunity and providing free legal assistance. By taking on such matters, advocates have been deemed to help to the attainment of social justice in all spheres of society. While providing free legal assistance, the statutory mechanism designated advocates to defend criminal cases for judicial remedy. The Legal Services Authorities Act, 1987 was established by India's parliament to encourage free legal assistance for impoverished persons who fall into the categories set forth in the Act's provisions.

Some of the rights enjoyed by Advocates in India would include the right to freedom of speech and expression under Article 19(1) of the Constitution of India, the right to represent his client in a court of law under Section 30 of the Advocates Act, 1961, the right to a fee consistent with their standing at the bar under Rule 11 of Chapter II of Part VI of the Bar Council of India Rules.

***2.*** ***What entities and/or mechanisms are in place to prevent and/or punish interferences with the free and independent exercise of the legal profession? Please briefly describe them and specify whether they are independent bodies or if they belong to the administrative structure of the State.***

Brazil is a Federal democratic republic with three levels of government (federal, state/provincial and municipal/local) and a separation of powers among the executive, the legislative and the judicial branches. Illegal interferences or breaches of the free and independent exercise of the legal profession can be the object of police investigations, prosecution and judicial accountability.

In addition to the general protection of the judicial system, the legal profession can be further protected by the *National Council of Justice* (“Conselho Nacional de Justiça”, or “CNJ”). CNJ is a public organ established in 2004. It exercises administrative control of the judiciary (except the Supreme Court) and has disciplinary powers over judges. In this sense, it can help protecting lawyers from arbitrary acts coming from the judicial system itself.

More recently, the Brazilian Bar Association had set the *National Commission for the Defense of Guarantees and Enhancement of the Lawyer Profession* (“Comissão Nacional de Defesa das Prerrogativas e Valorização da Advocacia”). Its mandate consists of adopting administrative measures and developing reports, studies and legal opinions regarding the protection and promotion of the free and independent exercise of the legal profession, as well as its values.[[8]](#footnote-8)

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In India, the Bar Council is a statutory body established by the Parliament, and is the main entity that works towards protection of the legal profession and maintaining standards. It further operates the Bar Council of India Trust which is dedicated to upholding professional standards in the legal profession and improving legal education. The trust is charged with establishing high-quality law schools and promoting legal research in order to achieve this goal. Other operations of the Trust include giving legal help to the poor, publishing student textbooks and law reports, and actions supporting the welfare of members of the Indian legal profession.

Through its placement plan, for example, the Trust supports the professional development of a number of meritorious young advocates. The Trust chooses advocates for year-long training under the initiative on a regular basis from the High Courts and the Supreme Court, including senior advocates and members of the Bar Council of India.[[9]](#footnote-9)

The State Bar Councils in India established as administrative entities further are entrusted with the function of supporting law reform and protecting the rights, privileges and interests of the Advocates on its roll. For instance, the Bar Council of Delhi manages the Advocates’ Welfare Fund and Indigent and Disabled Advocates Financial Assistance to provide financial assistance to advocates in need and ensure their protection.

The Delhi government established a committee to develop a policy for the benefit of lawyers. Rakesh Kumar Khanna, a Senior Advocate, led the committee. The government has approved a fifty-crore yearly budget for the project. Following extensive consideration, the committee suggested that a ten-lakh life term insurance, medical coverage, life insurance to the beneficiaries of advocates registered in Delhi, an e-library with e-journals, and a creche facility for advocates, staff, and workers be given under this system. Thus, the government of NCT Delhi adopted the Chief Minister's Advocates' Benefit Scheme for the welfare of advocates on December 18, 2019, during a cabinet meeting.

Since no steps had been taken to implement the scheme, the petition argued that they should be taken during this Covid period, so a writ of Mandamus was issued against the NCT of Delhi, ordering them to release the funds and issue insurance policies to the 29,098 advocates registered under the CM Advocates' Welfare Scheme.[[10]](#footnote-10) Around 37,142 lawyers applied for the scheme's benefits using the website set up by the Government of NCT Delhi's I.T Department. The applications were accepted until April 19, 2020, and the data was given to the Bar Council of Delhi (BCD), which was then confirmed, with a total of 29,098 advocates standing as verified and enrolled with the BCD.[[11]](#footnote-11)

The advent of the Covid-19 epidemic, it was asserted, made it imperative to give the certified advocates with the insurance benefit in a timely manner. The system should be beneficial to all advocates who are inhabitants of the state. The welfare scheme's objective would be rendered nugatory if it failed to deliver benefits to the target individuals during this unique epidemic. This was yet another mechanism that was adopt for the protection of lawyers in the country.

***3. Please indicate if there are any legislative, administrative, or institutional barriers that have hindered the work of lawyers and the exercise of the legal profession in your country, and describe them.***

In Brazil, there had been reports and international documentation regarding acts of intimidation and violence against lawyers throughout the years, in contexts such as legal representation in matters of police violence, the promotion of human rights among the military and legal representation in matters of land conflicts.[[12]](#footnote-12)

**On December 4, 2020, the Inter-American Commission on Human Rights (IACHR) presented the Gabriel Sales Pimenta case to the Inter-American Court of Human Rights, regarding Brazil. The case refers to the State's responsibility for the death of Gabriel Sales Pimenta and the subsequent impunity of his assassination. Mr. Pimenta was a lawyer for the landless. According to the IACHR, his death occurred as a retaliation to his successful legal work defending poor rural workers against violent landowners.[[13]](#footnote-13)**

**The case is** [**still pending before the Inter-American Court of Human Rights**](https://www.corteidh.or.cr/docs/tramite/sales_pimenta.pdf)**. Since the public hearing of the case has not yet been scheduled and executed, it is procedurally possible for third parties to present their contributions as friends of the Court (*Amici Curiae*). We respectfully invite the UN Special Rapporteur to consider contributing to the Inter-American Court as an *Amicus Curiae* in this case, as the Inter-American Court can potentially approach the facts of the matter in light of full reparation and guarantees of non-repetition.**

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In India there is an ongoing debate regrading an urgent review of the Contempt of Court Act, 1971. Section 2(a) of the Contempt of Court Act, 1971 defines Contempt of Court as civil or criminal contempt. Contempt law as a concept seeks to protect judicial institutions from motivated attacks and unwarranted criticism, and as a legal mechanism to punish those who want to lower its authority. However, it is generally felt that the existing law relating to contempt of courts is somewhat vague, uncertain, and not satisfactory. Contempt under the Act is classified as civil contempt and criminal contempt; however, the concept of contempt is neither clearly defined nor there is any framework/guideline given by the judiciary to understand the concept itself. Further, it has been argued that the 1971 Act hits upon the important fundamental right of the citizens (including advocates), namely, the Right to Freedom of Speech and Expression under Article 19 of the Indian Constitution. The debate on a need to review the 1971 Act has gained momentum because of a recent contempt case against a senior advocate of the Supreme Court of India that took place in 2020. The senior advocate had made certain remarks against the Supreme Court of India and its judges for not playing a proactive role in ensuring that democratic institutions in India remain free from undue influence of the executive. The remarks by the senior advocate were considered as undermining the faith of the citizens of India in the Indian Judiciary and contempt proceedings were initiated against the senior advocate. The senior advocate was not given the protection of the right to freedom of speech and expression under the constitution, although, he argued that he had made the remarks in good faith and wanted to only remind the Court and the judges of their constitutional duty. The contempt proceedings against the senior advocate sparked fresh debate on the 1971 Act mainly on the point that the contempt power under the Act in a democracy is supposed to only enable the court to function effectively, and not to protect the self-esteem of an individual judge.

***4. Please describe the role of the national bar association(s) in protecting lawyers and the free exercise of the legal profession. Is the bar association de jure and de facto independent from the State?***

In Brazil, according to Article 44, paragraph 1 of the Statute governing the practice of law and the Brazilian Bar Association, “OAB does not maintain any functional or hierarchical relationship with Public Administration bodies.”[[14]](#footnote-14) The Bar’s independence has been acknowledged, inter alia, by the Brazilian Supreme Court; OAB was considered by the Court as a unique entity that provides independent public service without being part of the State bureaucracy and control.[[15]](#footnote-15)

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In India, Section 7 of [the Advocates Act, 1961](https://legislative.gov.in/sites/default/files/A1961-25.pdf) establishes the regulatory and representational function of the Bar Council. The Bar Council's responsibilities include:

* Establishing guidelines for advocates' professional behaviour and manners.
* Specifying the procedure that disciplinary panels must follow.
* Protecting the advocates' rights, privileges, and interests.
* Encouraging and promoting legal reform.
* Dealing with and resolving any case presented by the State Bar Council.
* Promoting legal education and establishing legal education standards.
* Determining which colleges need a law degree as a prerequisite for enrolment as an advocate.
* Organizing famous jurists to speak at seminars on legal themes, and publishing legal journals and publications.
* Organizing and provide legal aid to the poor.
* Recognizing foreign qualifications in law obtained outside India for admission as an advocate.
* Managing and investing funds of the Bar Council.
* Providing for the election of its members who shall run the Bar Councils.

***5. Please provide*** ***detailed information on the number of lawyers that have been subject to criminal, administrative or disciplinary proceedings in the last five years for alleged violations of standards of professional conduct. How many of them were found guilty? How many of them were ultimately disbarred?***

In Brazil, Chapter IX of the Statute governing the practice of law and the Brazilian Bar Association regulates disciplinary proceedings for alleged violations of standards of professional conduct. Art 35 of the Statute provides for penalties such as censorship, suspension, exclusion and fine.[[16]](#footnote-16) These penalties follow a gradation according to conduct’s seriousness, consequences and reiteration.[[17]](#footnote-17) The Statute deals only with hypotheses of irregular conducts in the practice of the legal profession that are subject to disciplinary sanctions. Criminal offenses in the context of the work of the lawyer fall within the scope of the Penal Code.[[18]](#footnote-18)

We have taken due diligence and found no detailed information on the number of lawyers that have been subject to criminal, administrative or disciplinary proceedings in the last five years for alleged violations of standards of professional conduct.

***6. Please provide information on any case where lawyers in your country have been subject to intimidation, hindrance, harassment or improper interference, whether from State authorities or non-State actors, for action taken in accordance with their recognized professional duties. Please also describe the measures that State authorities have taken to investigate and bring perpetrators to justice.***

In Brazil, the Bar’s *National Commission for the Defense of Guarantees and Enhancement of the Lawyer Profession* has registered 72 homicides of lawyers in the country from 2016 to 2018. The Commission believes that 45 of them could be directly related to the exercise of the legal profession.[[19]](#footnote-19)

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In India, there has been reports by international NGOs about hostile acts by officials against the work of human rights advocates.[[20]](#footnote-20)

Recently, lawyer Indira Jaising received news that the Narendra Modi government had cancelled the Foreign Contributions (Regulation) Act (FCRA) license to her organisation Lawyers Collective (LC).[[21]](#footnote-21)

Moreover, lawyers were among the persons that were targeted by the Pegasus spyware.[[22]](#footnote-22) This kind of interference would hinder their professional life to a great extent.

***7. What activities does your organization carry out to promote the independence of the legal profession? Do you co-ordinate with other organizations with similar functions in other countries or regions? Are you part of a network for this purpose? Please give examples.***

Facts and Norms Institute is an independent academic institution based in the Global South, with members present in all continents. The Institute’s mission is straightforward: to promote a rational, human rights-based approach to social issues. Since its establishment during the first semester of 2021, the Institute trained more than 40 researchers, mostly lawyers, in applied human rights research using the UN Universal Human Rights Index. The Institute also conducted research about varied human rights topics, including the relations between human rights and infectious diseases, torture, religious intolerance, social participation, transitional justice, rights of persons with albinism, criminalization of persons living in the street and in extreme poverty and the present note about the protection of lawyers in Brazil and India.

***8. To what extent have the legislation and/or measures adopted in your country because of the Covid-19 pandemic affected the exercise of the independence of the legal profession or security of lawyers? Please explain.***

The Brazilian Bar Association established a *Special Committee of Jurists for the Analysis and Recommendations of Measures to Tackle the Covid-19 Pandemic* (“Comissão Especial de Juristas da OAB Nacional para Análise e Sugestões de Medidas de Enfrentamento da Pandemia do Coronavírus”). On April 2021, the Special Committee presented a Legal Opinion according to which conducts adopted by the President of Brazil in the context of the pandemic resulted in national and international crimes, including murder and bodily harm through “improper omission”, or “commission by omission”, and crimes against humanity.[[23]](#footnote-23) This Opinion is linked with a study lead by the Centre for Studies and Research on Health Law of the University of São Paulo with the aim of collecting federal and state regulations relating to Covid-19 and assessing their impact on human rights in Brazil. It is available in English.[[24]](#footnote-24)

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The legal profession in India has been adversely affected by the Covid epidemic, as has been the case in other countries. Following the national lockdown, the Supreme Court released the following set of directions on how courts should operate during the lockdown on April 6, 2020:

* The Supreme Court and the High Courts were to adopt all steps possible to decrease the necessity for persons to physically be present in courtrooms.
* The Supreme Court of India and the High Courts of India have been given authority to employ video conferencing technology to ensure the smooth operation of the judicial system.
* Each High Court was given the authority to select the modalities that would be appropriate for the temporary use of videoconferencing technology.
* The courts were required to establish a hotline to handle concerns about the feed's quality or audibility.
* District courts in each state were required to use the video conferencing mode stipulated by the relevant High Court.
* Courts were supposed to notify and make information available.
* Video conferencing was to be used primarily for hearing arguments at the trial and appeal stages until proper regulations were formulated by the High Courts. There was never a time when videoconferencing was used to capture evidence without both parties' assent.[[25]](#footnote-25)

When all courts switched to online hearings, the technology and physical facilities necessary for online hearings were not accessible in every court. According to official statistics provided in 2019, the country has video conferencing services in 488 court complexes (out of a total of 3280 court complexes) and 342 prisons (out of a total of 1350 prisons).[[26]](#footnote-26) According to statistics submitted to the Department of Justice by the Supreme Court's e-Committee, 3477 courtrooms have videoconferencing capabilities as of September 2020, whereas 14443 did not. There are now 2992 locations without WAN (wide area network) access.[[27]](#footnote-27) As a result of the lack of bandwidth and physical space, the move from physical to online hearings resulted in a reduction in the number of cases handled by courts. This led to several complications for lawyers.

The closure of courts for the lockdown also led to a decrease in fresh litigation with fewer people approaching courts with disputes.[[28]](#footnote-28) This would further affect the free and independent practice of advocates.

We weren't prepared, as we depended heavily on physical files. No data was instantly available in digital format. It took us months to convert data/files into digital copies that again had to be updated manually and regularly as cases proceeded. No system was in place to shift to digital from physical.[[29]](#footnote-29)

***9. Please describe the measures and policies you would suggest to better protect and guarantee the free exercise of the legal profession.***

Regarding Brazil, the Institute wishes to reiterate past observations by different instances of the UN so measures are adopted i) to guarantee that lawyers access their clients when they are imprisoned[[30]](#footnote-30); ii) to strengthen the State’s capacities to police, investigate, prosecute and punish those responsible for threats, aggressions and murders of lawyers and human rights defenders in general.[[31]](#footnote-31)

Even though these derive from observations made by UN instances in the past, their full implementation continues to be perfectly in order.

In conclusion, the Institute notes that the need for an improved system of justice to tackle impunity is of particular importance and dialogues with the reflections about non-repetition in the above-mentioned case of Gabriel Sales Pimenta vs. Brazil[[32]](#footnote-32) (see the box in the response to Question 3 *supra*).

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Regarding India, the Advocates (Protection) Bill, 2021 addresses most areas of unjustified issues and worries that obstruct the justice process and make it difficult for advocates to do their duty. The Bill, on the other hand, does not properly address the question of earning payments from customers while providing professional services. Clients' failure to pay their debts results in a slew of unpaid invoices in the hands of advocates, jeopardizing their livelihood. In this context, a clause establishing a procedure for collecting or obtaining fees in the event that the client refuses to pay could be a reasonable legislative advancement.

Litigation in India, especially for new lawyers, seems to be a challenge for advocates as they are not able to work with such a huge financial burden with low pay, and struggle to establish themselves. According to a poll by legal think-tank Vidhi Centre for Legal Policy (Vidhi), more than 79 percent of questioned attorneys across seven high courts claimed that advocates with less than two years of legal practice at the Bar earn less than Rs. 10,000 per month. The typical monthly salary for a lawyer in the first two years of practice, according to 80% of the polled counsel from the Delhi high court, may be between Rs. 5000 and 20,000. The study, which was carried out as part of Vidhi's Justice, Access, and Lowering of Delays Initiative (JALDI), polled 2,800 lawyers from eight high courts on their perceptions of judicial functioning and other professional circumstances that impact their work.[[33]](#footnote-33) This clearly shows that the pay for junior advocates is low. A policy for providing financial assistance to fresh lawyers, especially in litigation, has the potential to support the profession in the difficulties of career commencement.

In conclusion, a neutral body that determines whether or not cases brought against advocates are in good faith, or a means of harassment or intimidation; one that is not linked with the Central government and is able to handle matters in an objective manner; that can be very beneficial to lawyers. The legal profession can also benefit from entities that act for their protection while maintaining independency, as the past experience of the country and other nations indicate that undue interferences in the work of lawyers can also originate from State actors.

1. \* Views on behalf of Facts and Norms Institute (exclusively). [↑](#footnote-ref-1)
2. ⊥ Facts and Norms Institute is an independent academic institution based in the Global South, with members present in all continents. The Institute’s mission is straightforward: to promote a rational, human rights-based approach to social issues. For more information, please visit [www.factsandnorms.com](http://www.factsandnorms.com) [↑](#footnote-ref-2)
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5. Conselho Federal da OAB, Regulamento Geral do Estatuto da Advocacia e da OAB. D.J., I, 16.11.94, p. 31.210-31.220. Available at: <https://www.oabsp.org.br/tribunal-de-etica-e-disciplina/legislacao/regulamento-geral> [accessed 2 December 2021]. [↑](#footnote-ref-5)
6. Conselho Federal da OAB, Código de Ética e Disciplina da OAB. D.J., I, 01.03.95, pp. 4.000/4004. Available at: <https://www.oab.org.br/visualizador/19/codigo-de-etica-e-disciplina> [accessed 2 December 2021]. [↑](#footnote-ref-6)
7. Shreya Kumari. [New Advocates Protection Bill](https://timesofindia.indiatimes.com/readersblog/legal-writing/new-advocates-protection-bill-2021-34871/). *Times of India*, 8 July 2021. [↑](#footnote-ref-7)
8. These measures include exposing individual, corporations or public authorities who might attempt to criminalize or hinder the work of lawyers. See the public statement issued by Conselho Federal da OAB in 09 September 2020, available at: <https://static.poder360.com.br/2020/09/nota-oab.pdf> [accessed 2 December 2021]. [↑](#footnote-ref-8)
9. See <<http://www.barcouncilofindia.org/about/bar-council-of-india-trust/>>. [↑](#footnote-ref-9)
10. See <<https://www.livelaw.in/news-updates/delhi-hc-approves-insurance-policy-to-implement-cm-advocates-welfare-scheme-29077-advocates-identified-as-beneficiaries-164126>>. [↑](#footnote-ref-10)
11. See <<https://www.livelaw.in/pdf_upload/pdf_upload-376669.pdf>>. [↑](#footnote-ref-11)
12. See, *e.g.*, Inter-American Court of Human Rights. [*Case of Nogueira de Carvalho and others vs. Brazil*](https://www.corteidh.or.cr/docs/casos/articulos/seriec_161_por.pdf). Sentence of 28 November 2006 (Preliminary Objections and Merits), *passim* (the Court’s decision is in Portuguese); Isabela Piacentini de Andrade. [Brazil: Independence and Safety of Judges and Lawyers](https://www.lrwc.org/wp-content/uploads/2012/03/Brazil.Attacks.on_.JudgesLawyers.LRWC_.pdf). *Lawyer’s Rights Watch Canada*, 17 July 2009; United Nations. [Report submitted by the Special Rapporteur on the situation of human rights defenders, Margaret Sekaggya](https://www2.ohchr.org/english/issues/defenders/docs/A.HRC.10.12.Add.1.pdf). Addendum. Advance Unedited Version. UN Doc. A/HRC/10/12/Add.1, 4 March 2009, paragraphs 284-287, 288-290, 318-322; United Nations. [Report of the Special Rapporteur on the independence of judges and lawyers, Leandro Despouy](https://www2.ohchr.org/english/bodies/hrcouncil/docs/11session/A.HRC.11.41.Add.1_EFS.pdf). Addendum. UN Doc. 3A/HRC/11/41/Add.1, 19 May 2009, paragraphs 54-55. [↑](#footnote-ref-12)
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17. Piovezan, Giovani Cássio; Freitas, Gustavo Tuller Oliveira (orgs.). *[Estatuto da OAB Comentado](http://www2.oabpr.org.br/downloads/ESTATUTO_OAB_COMENTADO.pdf)*. Curitiba: OAB Paraná, 2015, p. 258. [↑](#footnote-ref-17)
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19. Voitch, Guilherme. [Desde 2016, Brasil registrou 72 assassinatos de advogados](https://veja.abril.com.br/blog/parana/desde-2016-brasil-registrou-72-assassinatos-de-advogados/). *Veja*, 21 August 2018. [↑](#footnote-ref-19)
20. Amnesty International decided to halt country operations citing "an assault of attacks, intimidation, and harassment by the government in a very systematic manner," according to Rajat Khosla, the organization's senior director of research (<<https://www.bbc.com/news/world-asia-india-54277329>>). Human Rights Watch reported a slew of "politically motivated charges... targeting human rights advocates, student activists, professors, opposition leaders, and critics" in its 2020 country review (<<https://www.hrw.org/world-report/2021/country-chapters/india>>) [↑](#footnote-ref-20)
21. See <<https://thewire.in/politics/fcra-indira-jaising-interview>>. [↑](#footnote-ref-21)
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